

REMARKS

This paper responds to the Communication dated April 13, 2004 entitled "Notice of Non-Responsive Amendment." This paper does not cancel, amend, or add any claims, so that claims 2-8, 33-41, and 43-55 remain pending in the Application.

This paper addresses only the rejection of claims 39-41 under 35 USC 103 as unpatentable over Sakai, et al. in view of Adventures in Fiber Optics Kit, and further in view of Bilbro, et al. The undersigned apologizes for missing this rejection when responding to the Office action dated October 22, 2003; page 4 of the Office action had become lost from the application file.

Applicant traverses the rejection of claims 39-41. Applicant's previous responses detail reasons why the Sakai and Adventures references fall short of claim 37, the parent of claims 39-41. Briefly, Sakai uses glass fibers, which have a visible seam, and thus cannot be "tiled without a visible seam," as recited in claim 37. Adventures shows only single sheets of Ulexite, and suggests no motivation whatsoever for tiling multiple sheets for any reason. Both of the references thus completely miss that fact that there may exist a material of any kind that has fiber sizes small enough to avoid "dead fibers" at the edges of a plate, and that such a property might allow multiple plates to be positioned adjacent each other without a visible seam.

The tertiary reference to Bilbro has a number of defects in the present context. In the passage quoted in the Office Action, Bilbro refers to his system as a "sensor array," not as a "projection screen" recited in parent claim 37. Bilbro shows no light sources at all except for a highly schematic single source 35, Fig. 3A, which is dismissed in three words as "a source 35" in col. 5 line 22. The recitations to "overlapping" sources in claim 39, to the particular devices named in claim 40, and to the "collimated source" in claim 41 find no basis whatsoever in Bilbro. This is of course understandable, in that Bilbro does not show a projection system, and thus has no concern for light sources. Thus, even an improper combination does not reach claims 39-41.

Furthermore, the combination is not proper under 35 USC 103 in any case. Regardless of the nature of Bilbro's system, his optical fiber segments are not "tiled" as required in parent claim 37. Bilbro in fact admits that the only optical fibers he considers cannot be tiled, for precisely the same reasons that Applicant notes: dead fibers at the edges. (Bilbro calls them

“inactive” or “inefficient” fibers; col. 4 lines 36-44.) His solution is thus not to tile at all, but rather to sidestep the issue by staggering adjacent bundles vertically (col. 5 lines 32-34), and to overlay the edges of one bundle on top of a portion of other bundles, “so as to occlude the overlaid portion from incident radiation thereon” (col. 5, lines 36-37), which produces a “shaded area” (col. 5, line 39) along an edge of a bundle, so that certain fibers “do not receive incident radiation thereon” (col. 5 lines 40-41). An edge that occludes or shades another edge cannot be said to be “tiled” with that edge, as recited in parent claim 37. That is, Bilbro, by giving up on tiling, actually teaches away from the present invention, which has found that one can in fact tile fiber bundles---but only when a certain kind of bundle is employed. It is not proper under 35 USC 103 to supply that missing insight entirely in light of the invention itself.

Conclusion

For the above and other reasons, Applicant respectfully urges that claims 39-41 distinguish patentably over the cited prior art, and ought to be allowed. This argument does not substitute for any arguments made with respect to other claims in the previous response filed on January 22, 2004.

Applicant therefore again urges that all presently pending claims are in condition for allowance, and requests notification to that effect. The Examiner is invited to telephone Applicant's attorney at (612) 373-6971 to facilitate prosecution of this Application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

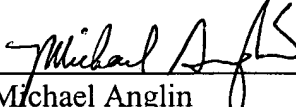
Respectfully submitted,

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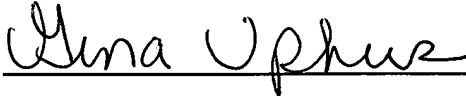
Date 13 Mar 2004

By 
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